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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

JUN 25 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
Federal-State Joint Board on)	CC Docket No. 96-45
Universal Service.)	CC Docket No. 97-160
		APD No. 98-1

COMMENTS OF SPRINT CORPORATION

In its *Universal Service Order*,¹ the Commission offered individual states the option of either concurring in the federal mechanism for determining federal universal service high cost support, or adopting their own state-specific cost studies. In the event a state elected to perform its own study, the Commission set forth explicit criteria upon which the study was to be based. In accordance with the Commission's directive, on May 26, 1998, 12 states submitted forward-looking cost studies for Commission approval. Pursuant to the Public Notice released June 4, 1998, Sprint Corporation herein submits its comments with respect to these cost studies.

Four states have chosen to use the HAI Model to perform their cost studies. While, as a sponsor of BCPM, Sprint disagrees generally with the choice made by these states, it appreciates that the states were, at the time they selected HAI, under the impression that the model would provide an acceptable view of

¹ Federal State Joint Board on Universal Service, Report & Order, CC Docket No. 96-45, FCC Rcd 8776, May 8, 1997 (*Universal Service Order*).

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the forward-looking cost of providing supported services. Recent events, however, have revealed that HAI is seriously flawed in that respect. Specifically, Sprint has discovered a systematic and significant bias in the HAI distribution plant module, the effect of which is to underestimate distribution plant distances and, therefore, distribution plant costs. Based on a sample of clusters analyzed by Sprint, the HAI model understated the amount of distribution plant required, in some cases by a factor of nine. This systematic understatement of distribution plant requirements, particularly for rural, less densely populated areas, will have serious ramifications on the determination of universal service fund support.

Due to administrative difficulties experienced while trying to obtain the data to needed to perform its analyses, Sprint was not able to uncover the existence of the HAI defect until late April – in some cases, too late to allow states to benefit from the discovery prior to making their May 26th filings.² While unfortunate, this timing issue must not be permitted to undercut the gravity of the HAI flaw. The fact is that, any cost study based on HAI is in violation of the majority of the criteria outlined in the *Universal Service Order*, specifically numbers:

² Sprint has relayed information regarding HAI's fatal defect to the Commission's staff, which has begun its own inquiry of the matter.

(1) that requires the "technology assumed in the cost study or model must be the least-cost, most efficient, and reasonable technology for providing the supported services that is currently being deployed;"

(2) that "any network function or element, such as loop, switching, transport, or signaling, necessary to produce support services must have an associated cost;"

(3) that "the study or model must be based upon an examination of the current cost of purchasing facilities and equipment;"

(6) that "the cost study or model must estimate the cost of providing service for all businesses and households within a geographic region;"

and

(8) that "all underlying data should be verifiable, engineering assumptions reasonable, and outputs plausible."³

Sprint wishes to make clear that the objection it raises here is not based upon the procedural failings of the particular states' cost studies; rather, Sprint is concerned that the inability of a study to meet the Commission's substantive criteria, coupled with the flaw inherent in any HAI output, combines to ensure that funding determinations based on such studies will be seriously deficient. Consequently, it is imperative that the Commission not permit any state to base

³ *Universal Service Order*, ¶250.

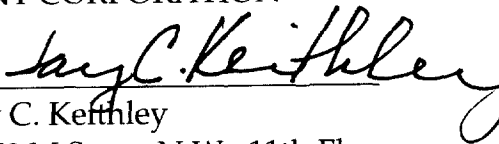
its determination of federal universal service support on the outcomes produced by HAI.

Puerto Rico, on the other hand, has chosen to use the BCPM model in performing its cost study. Sprint has no quarrel with Puerto Rico's model selection, but finds it necessary to question the inputs utilized in the performance of that cost study. Using BCPM default inputs, the necessary federal universal service funding for Puerto Rico is approximately \$27 million. Puerto Rico has, however, presented a study supporting a funding level of \$191 million. Sprint is not in a position to challenge Puerto Rico's individual inputs; however, it believes that this discrepancy requires the Commission's careful review of individual inputs to ensure that they represent the costs that an efficient company would incur.

For example, the BCPM default inputs for operating expenses per line is \$11.34 per month. Puerto Rico, however, has used inputs totalling \$26.68 to represent its monthly per line operating expenses. The BCPM defaults are based on the weighted average of expense levels of several large ILECs. Sprint understands that Puerto Rico Telephone Company may have expenses greater than those of the large ILECs. At the same time, however, Sprint seriously questions whether those expenses are more than double those represented by the BCPM defaults. Consequently, as stated above, Sprint urges the Commission to

review carefully the inputs used by all states, but specifically Puerto Rico, in the proffered cost studies.

Respectfully submitted,
SPRINT CORPORATION

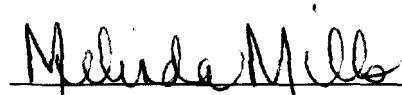
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June 25, 1998

CERTIFICATE OF SERVICE

I, Melinda L. Mills, hereby certify that I have on this 25th day of June 1998, served via U.S. First Class Mail, postage prepaid, or Hand Delivery, a copy of the foregoing "Comments of Sprint Corporation" in the Matter of Federal-State Joint Board on Universal Service, Forward-Looking Mechanism for High Cost Support for Non-Rural LECs, CC Docket Nos. 96-45, 97-160, APD 98-1, filed this date with the Secretary, Federal Communications Commission, to the persons on the attached service list.



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